

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

District of New Mexico

United States of America

v.

Jacob P. Wheeler
DOB: xx-xx-1990
SSN: xxx-xx-0133

Defendant(s)

Case No.

FILED
UNITED STATES DISTRICT COURT
ALBUQUERQUE, NEW MEXICO

MAY 22 2015

MATTHEW J. DYKMAN
CLERK

15mj1707

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 05/15/2015 in the county of Santa Fe in the
State and District of New Mexico, the defendant(s) violated:

Code Section

Offense Description

18 U.S.C. 2113(a)

Bank robbery and incidental crimes

This criminal complaint is based on these facts:

See attached affidavit.

☒ Continued on the attached sheet.Samuel T. Hartman
Complainant's signatureSamuel T. Hartman, Special Agent, FBI
Printed name and title

Sworn to before me and signed in my presence.

Date: May 22, 2015 at 3:45 pmCity and state: Albuquerque NMKaren B. Molzen
KAREN B. MOLZEN
U.S. MAGISTRATE JUDGE

Printed name and title

from the back of his pants. He had short, dark brown hair, and a dark spot on the top of his head.

4. During the robbery, the UM entered the bank, pulled out his gun, and made a gesture to cock the gun. The UM approached teller and demanded that she give him the money she had. He immediately climbed up on the counter and tried opening the drawer containing the cash. While doing so, he kept the gun pointed at teller. The UM finally opened the drawer, pulled out some money, and ran out. That is when teller activated the alarm. The teller walked over to the front of the bank and saw a Red Ford 500, with black rims, and black tinted windows, leave the bank parking lot. This was the same vehicle that the teller saw park in front of the bank, but then pull over to the side out of view immediately before the robbery.
5. After the UM left, the Santa Fe Police Department (SFPD) responded to the bank robbery. Teller advised them of the make and model of the vehicle that the UM departed in and also advised that the UM was known to teller as Jacob Wheeler. The SFPD located the vehicle near the Rail Yard district in Santa Fe. Once located, the vehicle sped away and the SFPD pursued. The SFPD pursued the vehicle to Rodriguez Street, Santa Fe, New Mexico. When the SFPD approached the vehicle, the driver had already abandoned the vehicle. The vehicle was located near Wheeler's home address of 231 ½ Rodriguez Street, Santa Fe, New Mexico. This vehicle was a 2005 Ford 500 bearing New Mexico registration 199RYN.
6. Your affiant received information that a 2005 red Ford 500, with license plate number 199RYN, was registered to Allanah Romero. Additional information listed the aforementioned address as the home address for Jacob Wheeler. On 05/22/2015, your affiant did a drive by of 231 ½ Rodriguez Street with SFPD SGT McCord. SGT McCord pointed at the house which was at the end of a cul-de-sac and had a white door.
7. Your affiant and SFPD Detective Anaya interviewed teller. The teller advised that he/she went to middle school with Wheeler. The teller further advised that Wheeler's girlfriend, Allanah Romero, had an account at Century Bank and visited the bank often to conduct

banking transactions. When Wheeler and Romero would visit the bank, they drove the same vehicle described above. On a 1 to 10 scale, teller stated that it was 8 that Wheeler was the bank robber.

8. After the SFPD located the above vehicle, they conducted a neighborhood canvass for Wheeler. While doing so, an individual later identified as Fortino Wheeler, the brother of Jacob Wheeler, approached the area that the officers were looking. The SFPD officers called Fortino out and without being prompted Fortino stated that he did not know anything about a bank robbery.
9. Later on May 15, 2015, Detective Anaya took the information and created two photo arrays to show to teller. The first photo array had a picture of Jacob Wheeler, and the second photo array had a picture of Fortino Wheeler. Detective Anaya showed the first array to the teller and she advised that she could positively identify Jacob Wheeler as the bank robber. Teller was shown the second photo array and advised that the photo of Fortino Wheeler was Jacob Wheeler's brother, and that he looked familiar. While Jacob Wheeler's brother looks familiar to the teller, she stated she recognized Jacob Wheeler as the individual who committed the robbery. After a few more minutes looking at the second array, the teller thought that the bank robber could possibly have been Fortino Wheeler because of the shape of his head. However, the teller noted that the bank robber was short, and that Jacob was shorter than Fortino. At the end of the interview, the teller was not 100% sure if it was Jacob Wheeler that committed the robbery. The teller also advised that the bank robber had a dark marking, maybe a birth mark that took up half of his head.
10. On May 15, 2015, FBI Albuquerque received an anonymous call and passed the information to affiant. Your affiant called the anonymous caller (AC1). AC1 stated that he saw the picture of the bank robber and that it looked like Jacob Wheeler. AC1 was asked if Jacob Wheeler had any brothers that looked like the bank robber, and AC1 stated that he would not give affiant the names because he knew the guy in the bank robbery picture was Jacob Wheeler.

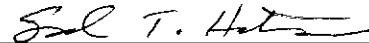
11. On May 16, 2015, FBI Albuquerque received another anonymous call and passed the information to affiant. Your affiant called the anonymous caller (AC2). AC2 stated that she saw the picture of the bank robber on Facebook and the bank robber was Jacob Wheeler. AC2 further advised that Wheeler was born on 12/17/1990, was 5'4", 130lbs, with brown hair, and brown eyes. AC2 also advised that Wheeler lived at 1517 Agua Fria Street, Santa Fe, New Mexico. Jacob Wheeler's mom lives on Rodriguez Street in Santa Fe, and that Wheeler worked at the Dollar Tree near Murphy's gas station on Cerrillos Road. Jacob has two brothers: Moses and Tino. AC2 knew that the bank robber was not Moses because Moses has more hair than Jacob. AC2 knew it was not Tino, because Tino wore reading glasses. AC2 further advised that she could "just tell" that it was Jacob. Jacob had told AC2 that he carries a Glock handgun around with him. AC2 also advised that Jacob had a Zia symbol tattoo on the back of his head, and more tattoos on his arms. Jacob drives his girlfriend's maroon Ford 500 with silver rims, and tinted windows.
12. On May 18, 2015, your affiant and Special Agent Michael Marycz interviewed a Cooperating Source (CS1). Your affiant showed CS1 a picture of the bank robber, and CS1 advised that it was Jacob Wheeler. On a scale 1 to 10, CS1 advised that it was a 10 for the picture being Jacob Wheeler. CS1 confirmed that Wheeler dated Allannah Romero and that he drove Allannah's red Ford 500. CS1 also advised that Wheeler and Romero were having financial hardships. CS1 has known Jacob Wheeler for at least five years.
13. On May 18, 2015, your affiant and Special Agent Michael Marycz interviewed another Cooperating Source (CS2). CS2 was shown a picture of the bank robber, and CS2 advised there was a 50-60% chance it was Wheeler. CS2 further advised that Wheeler has a big Zia symbol tattoo on the top of his head and that the four sides of the symbol extend to the front, back, and sides of his head.
14. On May 15, 2015, your affiant received information from SFPD that right before the bank robbery, an UM described as the same that robbed the bank, impersonated a police officer at Michaels department store in Santa Fe. On May 18, 2015, Steve Duran,

manager at Michaels, provided information to affiant. Duran advised that an individual came into Michaels around 3:10pm on Friday May 15, 2015, and asked to talk to a manager. The individual was wearing a black hooded sweatshirt, jeans, had handcuffs hanging from his jeans in the back, and had a handgun displayed. The UM told the Michaels manager that afternoon that he was a police officer and that he needed to view surveillance video of the parking lot. The manager asked for identification and the UM said he would get it from his car. The UM departed Michaels and ran towards the Best Buy.

15. Your affiant viewed Michaels' surveillance video from the above incident and surveillance video from the bank. The UM depicted in the surveillance video at Michaels matched the bank robber in surveillance video from the bank. They both had the same clothing, the handcuffs, and their physical size is similar. Your affiant believes that the UM that impersonated the police officer at Michaels was the same individual that robbed Century Bank.
16. Your affiant then reviewed surveillance footage from the outside of a Ross department store in Santa Fe that was near the Michaels department store. Your affiant observed a red Ford 500, with tinted windows, drive in front of the Ross store approximately 30 seconds to 1 minute after the incident at Michaels.
17. Based on the above, your affiant believes probable cause exists that Jacob Wheeler, did, by force, violence, and intimidation, take money from the Century Bank, 498 N. Guadalupe Street, Santa Fe, New Mexico, on April 15, 2015, in violation of 18 U.S.C. Section 2113.

I swear that this information is true and correct to the best of my knowledge and belief.

Respectfully submitted,




Samuel T. Hartman

Special Agent

Federal Bureau of Investigation

Subscribed and sworn to before me this 22nd day of May, 2015.



Honorable Karen B. Molzen

United States Magistrate Judge